

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

F1 AIR, LLC,

Plaintiff,

v.

KAIZEN AVIATION, INC.,

Defendant.

Civil Action No. 05-11508-RCL

**REQUEST FOR ENTRY OF DEFAULT
AGAINST DEFENDANT KAIZEN AVIATION, INC.**

Pursuant to Fed. R. Civ. P. 55(a), the Plaintiff, F1 Air, LLC, ("F1 Air" or "the Plaintiff") hereby request that the Clerk enter the default of the Defendant Kaizen Aviation, Inc. ("Kaizen Aviation") for failure to answer the Plaintiffs' complaint. As grounds for this request, the Plaintiff states:

1. On July 15, 2005, the Plaintiff filed the Complaint in this action, alleging breach of a promissory note by Kaizen Aviation. The relief sought is for a sum certain of \$149,794.66, plus interest at eight (8) percent annually, costs and attorneys' fees. See Complaint ¶¶ 14-19, attached hereto as Exhibit A.

2. On August 3, 2005, the Plaintiff effectuated service of process on Kaizen Aviation, who, pursuant to applicable Court rules, was required to plead or otherwise defend by August 23, 2005. See Exhibit B hereto.

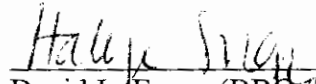
3. To date, Kaizen Aviation has not served an answer or responsive pleading upon the Plaintiff's counsel.

WHEREFORE, the Plaintiff requests that the Clerk enter the default of the Defendant, Kaizen Aviation, in the docket of this case.

Respectfully submitted,

F1 Air, LLC,

By its attorneys,


David L. Evans (BBO #156695)
Halye A. Sugarman (BBO # 646773)

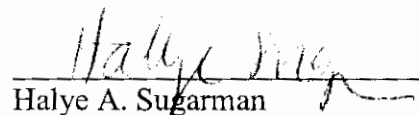
HANIFY & KING
Professional Corporation
One Beacon Street
21st Floor
Boston, MA 02108
(617) 423-0400

Dated: August 26, 2005
436608

CERTIFICATE OF SERVICE

I, Halye A. Sugarman, hereby certify that I have this 26th day of August 2005 served a copy of the foregoing Request for Entry of Default Judgment by mailing a copy of same, postage prepaid to:

Harold Shafer
Kaizen Aviation, Inc.
3517 Beauclerc Wood Lane West
Jacksonville, FL 32217


Halye A. Sugarman